

# **EXHIBIT A**

---

**From:** Akiva Cohen <acohen@kusklaw.com>

**Sent:** Thursday, May 29, 2025 8:26 PM

**To:** Wallace, Thomas Cullen <cullen.wallace@morganlewis.com>

**Cc:** Alamuddin, Sari M. <sari.alamuddin@morganlewis.com>; Chowdhry, Kaiser H.

<kaiser.chowdhry@morganlewis.com>; Loughnane, Brian <brian.loughnane@morganlewis.com>; Barillare, Jody C.

<jody.barillare@morganlewis.com>; Meckley, Eric <eric.meckley@morganlewis.com>

**Subject:** RE: Arnold v. X Corp. - extension request

[EXTERNAL EMAIL]

I hear you. Please let me know when you and Jody are available to meet and confer in advance of our motion for leave to amend.

---

**From:** Wallace, Thomas Cullen <[cullen.wallace@morganlewis.com](mailto:cullen.wallace@morganlewis.com)>

**Sent:** Thursday, May 29, 2025 9:13 PM

**To:** Akiva Cohen <[acohen@kusklaw.com](mailto:acohen@kusklaw.com)>

**Cc:** Alamuddin, Sari M. <[sari.alamuddin@morganlewis.com](mailto:sari.alamuddin@morganlewis.com)>; Chowdhry, Kaiser H.

<[kaiser.chowdhry@morganlewis.com](mailto:kaiser.chowdhry@morganlewis.com)>; Loughnane, Brian <[brian.loughnane@morganlewis.com](mailto:brian.loughnane@morganlewis.com)>; Barillare, Jody C.

<[jody.barillare@morganlewis.com](mailto:jody.barillare@morganlewis.com)>; Meckley, Eric <[eric.meckley@morganlewis.com](mailto:eric.meckley@morganlewis.com)>

**Subject:** Re: Arnold v. X Corp. - extension request

Akiva,

Following up on the below, we would like to comply with Judge Hughes's order requesting that the parties submit supplemental briefing on the veil piercing issue and to then allow Judge Hughes the opportunity to rule on the numerous issues that will have been fully briefed to him over many months—especially considering that, at your express request, the parties recently prepared for and attended oral argument on these issues in Delaware. You also recently requested, and we did not oppose, an extension to the Court's briefing deadline concerning the veil piercing issue, so we are further confused as to why the below is being raised at this juncture. In short, we believe the law requires that Judge Hughes be afforded the opportunity to decide the issues before him and we do not consent to starting over from scratch after many months of litigation.

Best regards,

Cullen

**T. Cullen Wallace**

**Morgan, Lewis & Bockius LLP**

1000 Louisiana Street, Suite 4000 | Houston, TX 77002-5005

Direct: [+1.713.890.5722](tel:+17138905722) | Cell: [+1.832.547.3126](tel:+18325473126) | Fax: [+1.713.890.5001](tel:+17138905001) |

[cullen.wallace@morganlewis.com](mailto:cullen.wallace@morganlewis.com) | [www.morganlewis.com](http://www.morganlewis.com)

Assistant: Nanci D. Mohr | [+1.713.890.5738](tel:+17138905738) | [nanci.mohr@morganlewis.com](mailto:nanci.mohr@morganlewis.com)

**From:** Wallace, Thomas Cullen <[cullen.wallace@morganlewis.com](mailto:cullen.wallace@morganlewis.com)>  
**Sent:** Thursday, May 29, 2025 6:23 PM  
**To:** 'Akiva Cohen' <[acohen@kusklaw.com](mailto:acohen@kusklaw.com)>  
**Cc:** Alamuddin, Sari M. <[sari.alamuddin@morganlewis.com](mailto:sari.alamuddin@morganlewis.com)>; Chowdhry, Kaiser H. <[kaiser.chowdhry@morganlewis.com](mailto:kaiser.chowdhry@morganlewis.com)>; Loughnane, Brian <[brian.loughnane@morganlewis.com](mailto:brian.loughnane@morganlewis.com)>; Barillare, Jody C. <[jody.barillare@morganlewis.com](mailto:jody.barillare@morganlewis.com)>; Meckley, Eric <[eric.meckley@morganlewis.com](mailto:eric.meckley@morganlewis.com)>  
**Subject:** RE: Arnold v. X Corp. - extension request

Akiva,

This has been forwarded to my attention. Please be certain to include me on all future communications concerning this matter. I am working on a response and will get back to you in short order.

Best regards,

Cullen

**Thomas Cullen Wallace**

**Morgan, Lewis & Bockius LLP**

1000 Louisiana Street, Suite 4000 | Houston, TX 77002-5005

Direct: +1.713.890.5722 | Main: +1.713.890.5000 | Fax: +1.713.890.5001

Assistant: Rachel Davis | +1.713.890.5717 | [rachel.davis@morganlewis.com](mailto:rachel.davis@morganlewis.com)

1717 Main Street, Suite 3200 | Dallas, TX 75201-7347

Direct: | Main: +1.214.466.4000 | Fax: +1.214.466.4001

[cullen.wallace@morganlewis.com](mailto:cullen.wallace@morganlewis.com) | [www.morganlewis.com](http://www.morganlewis.com)

**GLOBAL IMPACT OF THE  
US ADMINISTRATION**  
Visit our resource center ➤

---

**From:** Akiva Cohen <[acohen@kusklaw.com](mailto:acohen@kusklaw.com)>  
**Sent:** Wednesday, May 28, 2025 10:03 AM  
**To:** Barillare, Jody C. <[jody.barillare@morganlewis.com](mailto:jody.barillare@morganlewis.com)>; Holly Anspach <[hanspach@christensenlawde.com](mailto:hanspach@christensenlawde.com)>; Alamuddin, Sari M. <[sari.alamuddin@morganlewis.com](mailto:sari.alamuddin@morganlewis.com)>

**Cc:** Joseph Christensen <[joe@christensenlawde.com](mailto:joe@christensenlawde.com)>

**Subject:** Re: Arnold v. X Corp. - extension request

[EXTERNAL EMAIL]

All, just following up on this to make sure it didn't get missed over the weekend

**From:** Akiva Cohen  
**Sent:** Monday, May 26, 2025 2:24 PM  
**To:** Barillare, Jody C. <[jody.barillare@morganlewis.com](mailto:jody.barillare@morganlewis.com)>; Holly Anspach <[hanspach@christensenlawde.com](mailto:hanspach@christensenlawde.com)>; [SARI.ALAMUDDIN@MORGANLEWIS.COM](mailto:SARI.ALAMUDDIN@MORGANLEWIS.COM) <[SARI.ALAMUDDIN@MORGANLEWIS.COM](mailto:SARI.ALAMUDDIN@MORGANLEWIS.COM)>  
**Cc:** Joseph Christensen <[joe@christensenlawde.com](mailto:joe@christensenlawde.com)>  
**Subject:** RE: Arnold v. X Corp. - extension request

Jody, Sari,

Happy Memorial Day. Thinking this through, given that we're going to be amending to address some of the other claims regardless (fraud, for example) I think we'd prefer to amend the complaint and then handle what will no doubt be a renewed motion to dismiss on a full record and without need for further amendments instead of briefing veil piercing on the existing record and then amending and rebriefing the motion to dismiss no matter where he lands on veil piercing.

If we stipulate that we will not seek a further amendment in response to a renewed motion (except to the extent that it would be based on information received only after 1 week before filing the second amended complaint), would you consent to leave to amend? (The 1 week is to give us time to review and consider any productions made in close proximity to the filing).

Please let me know,

Akiva

---

**From:** Barillare, Jody C. <[jody.barillare@morganlewis.com](mailto:jody.barillare@morganlewis.com)>  
**Sent:** Wednesday, May 7, 2025 12:15 PM  
**To:** Holly Anspach <[hanspach@christensenlawde.com](mailto:hanspach@christensenlawde.com)>  
**Cc:** Joseph Christensen <[joe@christensenlawde.com](mailto:joe@christensenlawde.com)>; Akiva Cohen <[acohen@kusklaw.com](mailto:acohen@kusklaw.com)>  
**Subject:** RE: Arnold v. X Corp. - extension request

Hi Holly,  
This is good by me. Thanks!

**Jody C. Barillare**

**Morgan, Lewis & Bockius LLP**

1201 N. Market Street, Suite 2201 | Wilmington, DE 19801  
Direct: +1.302.574.7294 | Main: +1.302.574.3000 | Fax: +1.302.574.3001  
[jody.barillare@morganlewis.com](mailto:jody.barillare@morganlewis.com) | [www.morganlewis.com](http://www.morganlewis.com)

**GLOBAL IMPACT OF THE  
US ADMINISTRATION**  
Visit our resource center ➔

---

**From:** Holly Anspach <[hanspach@christensenlawde.com](mailto:hanspach@christensenlawde.com)>  
**Sent:** Wednesday, May 7, 2025 12:03 PM  
**To:** Barillare, Jody C. <[jody.barillare@morganlewis.com](mailto:jody.barillare@morganlewis.com)>

**Cc:** Joseph Christensen <[joe@christensenlawde.com](mailto:joe@christensenlawde.com)>; Akiva Cohen <[acohen@kusklaw.com](mailto:acohen@kusklaw.com)>

**Subject:** Arnold v. X Corp. - extension request

[EXTERNAL EMAIL]

Mr. Barillare,

Attached please find a DRAFT Stipulation to Extend Time for your review and revision. Upon sign-off, I will get this on file. Thank you.

Holly

Holly Anspach  
**Christensen Law LLC**  
[hanspach@christensenlawde.com](mailto:hanspach@christensenlawde.com)

CONFIDENTIALITY AND PRIVACY NOTICE: This email is from a law firm and may contain information that is confidential, privileged, and/or attorney work product. This email may also contain personal data, which we process in accordance with applicable data protection laws and our [Privacy Policies and Notices](#). If you are not the intended recipient, you may not review, copy, or distribute this message. If you have received this email in error, please contact the sender immediately and delete all copies from your system.